

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO

APPLICATION AND AFFIDAVIT OF THE )  
UNITED STATES OF AMERICA FOR A ) Magistrate Judge Deavers  
SEARCH WARRANT OF THE UNITED ) Case No. 2:24-mj-458  
STATES POSTAL SERVICE PRIORITY ) UNDER SEAL  
MAIL PARCEL BEARING TRACKING )  
NUMBER 9505 5152 6658 4253 1181 26 )

I, Justin D Koble, Postal Inspector with The United States Postal Inspection Service, being  
duly sworn, depose and say:

## INTRODUCTION

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the United States Postal Service Priority Mail parcel bearing tracking number 9505 5152 6658 4253 1181 26 (SUBJECT PARCEL), further described in Attachment A, for the things described in Attachment B. The SUBJECT PARCEL is currently located in the Southern District of Ohio, Eastern Division.

2. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS) and have been so employed since 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS's Columbus, Ohio field office. In this capacity, I am responsible for investigating the illegal use of the United States Mails for the purpose of transporting controlled substances, such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of, among other statutes, Title 21, United States Code, § 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I

am responsible for investigating possible violations of Title 18, United States Code, § 1956 and 1957 (money laundering).

3. I have been involved in the investigation and discovery of drug contraband and drug proceeds on numerous occasions. I have personally been the affiant for search warrants that have resulted in the discovery of controlled substances and drug proceeds. My current assignment to the Columbus Processing and Distribution Center (P&DC) involves investigating the use of the United States Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.

4. Experience and drug trafficking intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.

5. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

6. On or about September 11, 2024, USPIS interdiction personnel in Columbus, Ohio interdicted the SUBJECT PARCEL upon arrival at the United States Postal Service (USPS) Reynoldsburg Post Office, Reynoldsburg, Ohio. The SUBJECT PARCEL is addressed to

“Sheryl Smith, 1582 Mulligan Ct., Reynoldsburg, OH 43068,” with a return address of “Bliss, 240 The Village #117, Redondo Beach, CA 90277.” The SUBJECT PARCEL is a white USPS Priority Mail large flat-rate box measuring approximately 12 ¼” x 12” x 6” and weighing approximately 5 pounds, 5 ounces. The SUBJECT PARCEL was mailed from the USPS Redondo Beach Main Post Office, 1201 N Catalina Avenue, Redondo Beach, California 90277 on or about September 9, 2024. The \$24.75 in US postage affixed to the SUBJECT PARCEL was paid for in cash. Below is a picture of the SUBJECT PARCEL.



#### PROBABLE CAUSE

7. Your Affiant has become aware through experience and training that drug traffickers frequently use Priority Mail Express and/or Priority Mail services offered by the

USPS, to transport narcotics and other dangerous controlled substances as well as drug proceeds. These services charge a higher fee because they are very timely, reliable and are trackable. However due to the higher fee, these services are not typically used for personal mailings but rather are utilized by commercial mailers and business customers. As they are mostly used for commercial services, they are typically paid for using electronic postage or credit card as opposed to being paid for in cash. Because these services are reliable and trackable, they are often favored by persons who transport contraband and/or illegal controlled substances and drug proceeds. When used for illegal activity, these services are frequently paid for in cash. In my experience and through training, drug traffickers pay for these services in cash so that the transaction cannot be traced to a particular credit card or business account, and because drug trafficking is often a cash business. As described above, the SUBJECT PARCEL was sent using Priority Mail and was paid for in cash.

8. Among the characteristics of the drug profile possessed by the SUBJECT PARCEL is the “source state” origination of the parcel, as well as the destination of the SUBJECT PARCEL.

9. Your Affiant submits that the origin state of the SUBJECT PARCEL bears on the issue of probable cause here. For example, US Postal Inspectors, Special Agents of the Drug Enforcement Administration (“DEA”), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio and a destination state for the proceeds from the sale of these illegal drugs. Based on my training and experience, I know drug traffickers frequently utilize various shipping and mail entities, including the United States Postal Service, for the shipment of controlled substances. Frequently the same shipping entity

utilized for the shipment of controlled substances is also utilized for the shipment of the proceeds derived from the sale of these controlled substances.

10. On or about September 12, 2024, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the destination information contained on the SUBJECT PARCEL. The destination address, “1582 Mulligan Ct”, was found to be a valid and deliverable address in the 43068-zip code. The name “Sheryl Smith” was not found to be associated with this address.

11. Further, on or about September 12, 2024, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, “240 The Village #117”, was found to be a valid and deliverable address in the 90277-zip code. The name “Bliss” was not found to be associated with this address.

12. Regarding both the above-described return and destination addresses, I know through training and experience, that shippers of drugs and drug proceeds will often utilize a fictitious return name or no name with a valid return address to legitimize the shipment and to reduce the possibility of identification and apprehension by law enforcement. Additionally, while a valid delivery address is necessary to ensure the delivery of a parcel, a fictitious delivery name or no name, is often utilized for the same reasons previously discussed.

13. Because the SUBJECT PARCEL originated in California, a state known as a source of controlled substances being mailed to Central Ohio, the SUBJECT PARCEL was paid for in cash, and the return and destination names did not associate with their respective address, investigators submitted the SUBJECT PARCEL for examination by a drug detecting canine.

EXAMINATION BY DRUG DETECTING CANINE

14. On or about September 12, 2024, US Postal Inspectors contacted Trooper Jake Lawrence, Ohio State Highway Patrol, who is the handler for "Darius," a Drug Detecting Canine. K-9 "Darius" has been certified by the Ohio Peace Officers Training Association since February 2024 for tracking, article search, and the detection of cocaine, heroin, methamphetamine, and their derivatives. K-9 "Darius" has had over 200 hours of training at the Ohio Highway Patrol K9 Training Facility. Both in training and actual deployments, K-9 "Darius" has successfully detected narcotics, by demonstrating clear, passive alerts, and has established himself as a highly reliable police service dog.

15. The SUBJECT PARCEL was hidden among other parcels and USPS mail processing equipment and K-9 "Darius" was allowed to search the entire area. Trooper Lawrence concluded that K-9 "Darius" did alert positively to the SUBJECT PARCEL. Based on that alert, Trooper Lawrence concluded that the odor of one or more of the drugs K-9 "Darius" is trained and certified to detect was present.

16. Based upon training and experience, I respectfully submit that the above information is indicative of drug trafficking activity, and that, based on the above, there is probable cause to search the SUBJECT PARCEL.

17. If the SUBJECT PARCEL is found to contain controlled substances, these controlled substances will be seized as part of an ongoing drug trafficking investigation.

#### CONCLUSION

18. Based upon the foregoing facts and my training, experience, and expertise as a US Postal Inspector, I submit there is probable cause to search the SUBJECT PARCEL for controlled substances, drug proceeds, and other evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

19. WHEREFORE, I respectfully request that the Court issue a warrant, authorizing agents of the USPIS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, and photograph, and seize, if necessary, the SUBJECT PARCEL and its contents.

20. The above information is true and correct to the best of my knowledge, information, and belief.

*Justin D. Koble*  
Justin D. Koble  
US Postal Inspector

Sworn and subscribed to me this 12 th day of September 2024

*Elizabeth A. Preston Deavers*  
Elizabeth A. Preston Deavers  
United States Magistrate Judge  
